



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

March 23, 2006

Jean Paul Bradshaw, Treasurer  
Graves for Congress  
2345 Grand, Suite 2400  
Kansas City, MO 64108

**Response Due Date:**  
**April 24, 2006**

Identification Number: C00359034

Reference: Year End Report (10/01/05 - 12/31/05)

Dear Mr. Bradshaw:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Schedule A of your report discloses one or more contributions that appear to exceed the limits set forth in the Act (see attached). You should examine all of your contributions to check for additional excessive contributions. The Committee's procedures for processing contributions should also be reviewed.

An individual or a political committee other than an authorized committee or qualified multi-candidate committee may not make a contribution to a candidate for federal office in excess of \$2,100 per election. An authorized committee may not make a contribution to a candidate for federal office in excess of \$2,000 per election. A qualified multi-candidate committee and all affiliated committees may not make a contribution(s) to a candidate for federal office in excess of \$5,000 per election. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (2 U.S.C. § 441a(a) and (f); 11 CFR § 110.1(b), (e) and (k))

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information. If any contribution you received exceeds the limits, you may have to refund the excessive amount.

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Excessive contributions may be retained if within sixty (60) days of receipt, the excessive portions are properly redesignated or reattributed. Guidelines for each option are provided below:

For reattributions, excessive contributions from individuals can be retained, if within sixty (60) days of receipt, the excessive amount is properly reattributed to another person. Please note that reattributions only apply to excessive contributions from individuals. An excessive contribution is considered properly reattributed if (1) the contributors provide the committee with written documentation, signed by each contributor, authorizing a reattribution and indicating the amount of the contribution to be attributed to each contributor, or (2) the committee reattributes, by presumption, the excessive portion of the contribution if the contribution was made on a written instrument from a joint account and was signed by only one of the account holders. In this case, the treasurer must notify the contributors in writing within 60 days of receiving the contribution that the committee intends to reattribute the excessive portion and must give the contributor an opportunity to request a refund. (11 CFR § 110.1(k)(3)(ii)(B))

For redesignations, the funds can be retained if within sixty (60) days of receipt the excessive amount is properly redesignated for a different election. An excessive contribution is considered properly redesignated if (1) the committee obtains signed written documentation from the contributor(s) authorizing the redesignation of the contribution for another election, provided that the new designation does not exceed the limitations on contributions made with respect to that election, or (2) your committee redesignates by presumption the excessive portion of the contribution for another election provided that the new designation does not exceed the limitations on contributions made with respect to that election. In this case, the treasurer must notify the contributor of the redesignation in writing within 60 days of the treasurer's receipt of the contribution. The notification must give the contributor an opportunity to request a refund. (11 CFR § 110.1(b)(5)(ii)(B)) Please note that you cannot presumptively redesignate an excessive contribution from a multi-candidate committee. Also, a contribution can only be redesignated to a previous election to the extent that the contribution does not exceed the committee's net debts outstanding for that election. (11 CFR § 110.1(b)(3)(i))

If the foregoing conditions for reattributions or redesignations are not met within 60 days of receipt of the contribution, the excessive amount must be refunded. See 11 CFR § 103.3(b)(1).

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Please inform the Commission of your corrective action immediately in writing and provide photocopies of any refund checks and/ or letters reattributing or redesignating the contributions in question. Refunds are reported on Line 20 of the Detailed Summary Page and on a supporting Schedule B of the report covering the period in which they are made. Redesignations and reattributions are reported as memo entries on Schedule A of the report covering the period in which the authorization for the redesignation and/or reattribution is received. (11 CFR § 104.8(d)(2), (3) and (4))

The acceptance of excessive contributions is a serious problem. Again, the committee's procedures for processing contributions should be examined and corrected in order to avoid this problem. Although the Commission may take further legal action, prompt action by you to refund, redesignate, and/or reattribute of the excessive amount will be taken into consideration.

-Line 1 of FEC Form 3Z-1 discloses \$0 in gross receipts for the Primary and General Elections. However, information provided on this report and in prior reports discloses additional activity that should be included in this total. Gross receipts should include all receipts collected by all of the candidate's authorized committees that are designated for the 2006 Primary and General Elections and disclosed on Lines 11, 12, 13, 14 and 15 of the Detailed Summary Page by all of the candidate's authorized committees. Please correct this discrepancy and file an amendment to your report. (11 CFR §104.19(b))

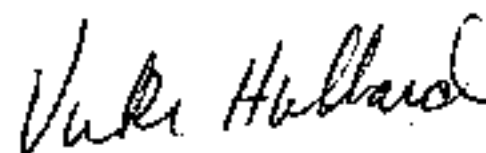
-Contributions from individuals and persons other than political committees must be itemized when the aggregate total from the contributor exceeds \$200 in an election cycle. This means that the committee does not have a reporting requirement of a contribution until the aggregate total exceeds the \$200 threshold. (2 U.S.C. §434(b)(3)) Should a committee wish to disclose contributions that do not require itemization, it must do so on a separate Schedule A and report the total amount of the contributions not requiring itemization on Line 11(a)(ii), unitemized contributions, of the Detailed Summary Page information. (11 CFR §104.3(a)(4)(i))

**Please note you will not receive an additional notice from the Commission on this matter.** Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

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Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1155.

Sincerely,



Vicki Hubbard  
Senior Campaign Finance Analyst  
Reports Analysis Division

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**Excessive and/or Prohibited Contributions**  
**Graves for Congress (C00359034)**  
**Year End Report (10/1/05-12/31/05)**

**P = Primary Election**  
**G = General Election**

CONTRIBUTOR NAME	DATE	AMOUNT	ELECTION
Aircraft Owners & Pilots Assn. PAC	03/31/05	2500	P2006
Aircraft Owners & Pilots Assn. PAC	06/15/05	1000	P2006
Aircraft Owners & Pilots Assn. PAC	11/08/05	1500	P2006
Aircraft Owners & Pilots Assn. PAC	12/21/05	5000	P2006
American Bankers Association PAC	05/27/05	1000	P2006
American Bankers Association PAC	06/30/05	2500	P2006
American Bankers Association PAC	11/16/05	1500	P2006
American Bankers Association PAC	11/16/05	1000	P2006
American Council of Engineers Co.s PAC	03/30/05	1000	P2006
American Council of Engineers Co.s PAC	06/29/05	1000	P2006
American Council of Engineers Co.s PAC	12/21/05	5000	P2006
Anheuser-Busch Political Action Committe	03/31/05	1000	P2006
Anheuser-Busch Political Action Committe	06/30/05	2500	P2006
Anheuser-Busch Political Action Committe	08/17/05	1000	P2006
Anheuser-Busch Political Action Committe	12/30/05	500	P2006
Anheuser-Busch Political Action Committe	12/30/05	2000	P2006
Union Pacific Fund for Effective Governnt	03/23/05	5000	P2006
Union Pacific Fund for Effective Governnt	11/08/05	2500	P2006
General Electric Company PAC	06/30/05	1000	P2006
General Electric Company PAC	12/21/05	1000	P2006
Penske Trucking Leasing Co. PAC	09/28/05	4000	P2006
Above committees are affiliated. See 11 CFR § 110.3(a)(1) for more information			

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